

## **A. Federal Question**

**List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.**

The court has jurisdiction over the subject matter and parties pursuant to 28 U.S.C. 1331, as this case involves question to federal law. This court also has jurisdiction pursuant to 28 U.S.C.&1343 because plaintiff – webb seeks damages for the violation of his civil rights. Jurisdiction is met in which the 28 U.S. Code &1332 Diversity of citizenship amount in controversy is well over the 75,000 sought in restitution.

## **B. Suit against the federal govt. a federal official, or federal agency**

## **C. Diversity of citizenship**

**These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.**

### **1. The Plaintiff**

The plaintiff, **Terry webb**, is a citizen of the State of **(Illinois)**

### **2. The Defendants:**

Venue is proper in, that defendants are subject to the personal jurisdiction of, this court because defendants GKN Aerospace/Mel-Rose LLC. Maintain facilities and business operations in this district, and all or most of the events giving rise to this this action occurred in this district. 28 U.S.C.& 1391(b) “42 U.S.C.& 2000e-5(f)(3).

Gkn and Melrose are incorporated under the laws in St. louis Mo and its principal place of business is in the state of Missouri.

### **3. The Amount in controversy**

he amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (explain): The plaintiff prays the court awards him all backpay to be made whole in the amount of 2 years of his salary average of 83,000 per year as well as be made whole In the pension money the plaintiff lost do to the acts committed by the defendant. The plaintiff is asking to be made whole in the amount of and or excess of 250,000 for all burdens Mr Webb has faced since his termination 11/20/19.

4. II. Statement of Claim Type, or neatly print, a short and plain statement of the FACTS that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments or cite court cases or statutes. You may attach additional pages if necessary.

On Nov 28, 2018, at 5:13 P.m. A manager over shipping and receiving sent the first of a few comments I deemed to be inappropriate and grounds for sexual harassment. It was a meme of girls covering their mouths with the quote of "I hear he eats pussy like a retard on bath salts" I gave no response as I was uncomfortable that a manager would be implying such things to me directly. Next was on Wednesday November 28<sup>th</sup> 6:28 p.m. Kacy Schuler shipping manager sent me a picture of her doing a keg stand in a bikini and said, "me in my younger days". I gave no response. Next mess in which I have marked exhibits is December 1<sup>st</sup> 6:13 p.m. she sent a meme asking me to "let her seduce me", I again gave no response. Lastly was on dec 3<sup>rd</sup> at 1:24 Pm and it was a meme of a woman saying I hear were expecting a few inches of snow tonight am I expecting a few inches from you Mr webb". Again, no response and I tried to stick to work conversations only. So, after my write up for what seemed frivolous and mind you in 12 years, I had no write ups prior I had saw Kevin Denwiddie at Kacy's desk and I didn't think anything of it as the two were laughing and carrying on and both saw me walk into the shipping and receiving area. But then the following day I was wrote up for not returning paint stools in which I ordered to Kevin and were addressed to me I was scared I was being targeted since I hadn't acted on the sexual advances by Miss Schuler. I send an email to my HR and an investigation had begun. Which brings me to my next point. As Jerney Stitzel the HR manager new at the time wanted to know a name with who I emailed hr. about who was sending these messages to me. I didn't trust mr Stitzel and he made everyone leave the office during or meeting over my writeup and he grabbed my phone and demanded I tell him my pin to get into my personal cell phone. I refused and the write up stayed and after this It came to light Jeremy was dating another lady in Hr and he thought that Shaina was who was messaging me. It wasn't obviously and Jeremy was even arrested outside of work and given an order of protection for acting estranged with Shaina Kassabam the HR journalist. I had a complaint filed against Mike Montgomery as he threw a box at me while using his desk as I was instructed to do so by Thomas Allen for ordering things for the cells and mechanics in CH53k. Now Shaina was investigating my hostile work environment claim with mike M and they did not follow up and since Jeremy S got fired Julie nautch was leaving the company and no one ever got me any answers on the sexual harassment claims. So, I began to get wrote up buy all bosses besides my own. I felt I needed to file a complaint of harassment with the EEOC and I did so. Now after a few weeks I was working in a complete building with tooling guys away from Mike M the manager I had complaints against for throwing things at me and getting in my face etc. I then was transferred back into his area working for him. I then stated to mike I had restrictions from medical and was not able to work in the areas he requested. He forced me anyway and I begin to break out with a rash. I sent emails and I have them to everyone in the company who would need them and begged to be removed and he stated I needed to have a dr sign off stating I was allergic. I went to the Dr the 12<sup>th</sup> of April and got my validation for him. Again, they forced me back to the area. I was then

breaking out so bad I had to go to medical at work. They advised my bosses I had to be moved I was allergic to the substance. They again forced me in this area, and I finally refused as it was hurting me bad, I was then wrote up for insubordination. I have recording marked as an exhibit. They said I had no restrictions and I begged and said you guys no I do this hurts bad. I was still subjected to work in an area I was told not to. The following day o woke up on the floor at my home barley able to breath the chemical I was allergic to got in my lymph nodes and I was unable to breath, I reported to work and i was met with managers who said they apologize they found my restrictions and would remove my write up, yet I was handed another one directly after having that one rightfully rescinded. I went out on FMLA and when I returned, I was transferred into paint shop. After 2 weeks roughly I was fired, and I didn't even get arbitration my union did nothing to help me. They fired me for attendance, and I was not even over the thresh hold of 9 points. I was harassed for being on FMLA and being retaliated against for filing a complaint within the EEOC and not engaging in sexual relations with Mrs Schuler I feel. I pray the court awards me at very little my job back and me made whole. And anything deemed fair to bring me back to whole after being subjected to such behavior. Thank you and God bless.

5. State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

I want my back pay for time off, I want my 401K to put back to where I was before this and I want my loans that went in collections fixed and put back to where I was before all this and my family is broke apart and I am a single dad now because I lost my job and was not able to provide. I want made whole is all I seek.

6. If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.  
I want my back pay and made whole that is 250,000 , and if I am awarded what is right and unable to go back to work I want paid in full as if I was to finish my career their I had easily 20 years left and on average employees make 83,000 a year so with overtime it would be possible to make 1 million every 11 years so 20 years 2 million dollars plus all my pension and 401 K money and as well as my back pay of 250.000.

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11. I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

7. I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24<sup>th</sup> day of August, 2021



Recoverable Signature

X Terry A webb

---

Terry A. webb

Signature of plaintiff \_\_\_\_\_ Signed by: kioskUser0

---